

REMARKS

Reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims are respectfully requested in light of the above amendments and the following remarks. Claims 1-16, as shown above, remain pending herein.

Claims 1-14 stand rejected under 35 U.S.C. §112, second paragraph. Applicants have amended the reference to the 8 X 8 DCT blocks and have overcome this ground of rejection. Reconsideration and withdrawal of this ground of rejection are respectfully requested.

Claims 1-16 stand rejected under 35 U.S.C. §103(a) over Stenger of record (DE 3608489 A1) in view of Katata et al. of record (U.S. 5,815,601, hereafter "Katata"), Woodfill et al. of record (U.S. 6,215,898 hereafter "Woodfill") and Chun et al. (U.S. 6,038,258, hereafter "Chun"). Applicants respectfully traverse this ground of rejection.

In particular, Applicants previously amended the claims to recite that the contour of a participant whose image is at least part of the stereo pair of images is not represented by a precise number of pixels but rather the contour is defined by the 8 X 8 DCT blocks.

It is alleged in the Office Action that the combination of references suggests the claimed invention in part because although Stenger, Katata and Woodfill are *admittedly silent* regarding contour DCT block coding, the claimed recitation in step (d) would be regarded as obvious in view of Katata's disclosure of a dynamic selected area provided by the particular position, shape, and/or facial image data coding within the area position

and shape encoding section. Chun is then cited to provide further proof in combination with the other references.

Applicants respectfully disagree that the disclosure that in Katata (col. 4, line 45 to col. 5, line 20), in combination with the other references discloses or suggests that at least part of the stereo pair of images is not represented by a precise number of pixels. In fact, a person of ordinary skill in the art, would glean from the combination of references that in fact the contour is made of a precise number of pixels. As each block in Katata comprises a plurality of pixels, there is nothing gleaned from the combination of reference regarding the precision of the representation of the contour. In Katata, the pixels within a block can have various states.

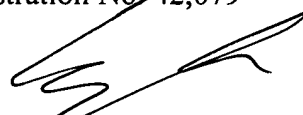
Moreover, when Chun is added to the combination of references, there is still no disclosure, suggestion, or motivation provided by the combination of references that would obviate of the instant claims. Chun teaches that the pixels within a block can have different values, meaning that when one takes the contour of an object, the precise number of pixels are used. Thus, the combination of the cited references still fails to disclose, suggest, or motivate the artisan such that any of the instant claims would have been obvious at the time of invention.

Reconsideration and allowance of this ground of rejection are respectfully requested.

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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